

Volunteers of America Mid-States
2020 PREA Annual Report

July 1, 2019-June 30, 2020

In accordance with 28 CFR 115.288-115.289

Volunteers of America Mid-States (VOA Mid) has historically embraced principles associated with the Prison Rape Elimination Act of 2003 (PREA). Prior to implementation of PREA in our programming, VOA Mid has always made it a priority to train and prepare staff to maintain standards that would prohibit inappropriate contact or relationships between staff and Clients. We have always maintained a high standard in requiring staff to attend trainings on boundaries that would assist in maintaining professionalism; including prevention of and elimination of possible sexual abuse or other inappropriate sexual behaviors within our facilities. As part of the Community Confinement Standard, our Halfway Back Mens Program held the primary responsibility of ensuring that all standards were followed under PREA zero tolerance of sexual abuse in confinement facilities since 2013. Over the years and expansion of our services, we have grown from serving a maximum of 50 men through the Department of Corrections to now serving over a possible 129 men and women in our fully functioning Addiction Recovery Services Residential and Outpatient Program. With this expansion and the increase in the population we serve, came the need to make significant modifications and improvements. In accordance with Standard 115.287, all data, collected, reviewed and aggregated in this report is from the fiscal year 2019-2020. In the following annual report, the findings will document improvements made to increase our efforts in effectively preventing sexual abuse, detection, response policy, practices and trainings.

At the close of fiscal year 2019, VOA Mid continued to maintain the three (3) designated residential treatment programs that meet the criteria for “Community Confinement facilities.” We continue to admit more than half of the Clients entering our women’s treatment program, and other men’s residential program, being involved in the justice system through home incarceration, probation or parole, or corrections through counties outside of Jefferson County. To maintain compliance with PREA, our PREA Policy continues to cover our entire Addiction Recovery Services (ARS), which would involve all residential programming of three (3) sites.

Identifying Problem Areas/Corrective Action

At the close of the fiscal year, we completed our PREA internal audit to identify areas of improvement. Our Quality Assurance and Compliance department carefully developed an internal checklist comprised of standards that are considered fluid and vital to our organization continuing to ensure that we maintain a safe environment for our Clients and staff. This process allowed VOA MID to bring the identified non-compliant or at risk areas into compliance. The below corrective actions are the results of this internal audit.

VOA MID requires a staffing plan to ensure safety and security of residents. Through this annual review, the staffing plans, video monitoring locations, and access were audited for needed modifications. An assessment of this plan was completed and deemed to meet PREA compliance.

During the auditor visit for fiscal year 2018, it was noted that many of the staff interviewed were within less than a year of their employment and unclear of the PREA policy. To ensure that VOA MID comply with employee training requirements, ARS implemented a quarterly, mandatory training schedule utilizing the approved training curriculum. All staff and Interns are required to attend the PREA trainings upon starting on their assigned unit. Additional training requirements and tracking of attendance was implemented for medical/mental health professionals along with specialized training for completing searches with the Transgender community. During this fiscal year, it was identified

that although staff received PREA trainings once they were assigned to their site, due to multiple barriers, a risk of the staff not receiving the training within their first 24 hours of work was extremely high. The modification recommended and approved to eliminate this risk was to institute the PREA required trainings at onboarding and apply the requirement that prior to an individual can actively begin working in their role, they must complete the trainings.

In 2018's audit, it was documented that within 72 hours of admission into our programs and by 30 days, VOA MID PREA policy states that we are to complete a risk assessment of sexual victimization and sexual abusiveness. Through our assessment, we identified that this practice was being completed regularly in the men's program. However, this was not the case in the women's program. To ensure compliance of this standard, we re-implemented the tracking system instituted during the last audit. This system tracks the date of the initial intake and triggers the date the re-assessment is to occur. In addition to this modification, due to observing increased risk of high risk offenders being accidentally admitted into the programs, we modified this portion of the policy to require the risk assessment be completed within 24 hours of admission. For the women's program, the risk assessment will be completed in intake and for the men's program, the risk assessment will be completed by a Men's tech before he is transported to his assigned floor. A monthly PREA meeting is scheduled with the PREA Coordinator and Tech's Supervisors to ensure this is occurring as stated.

VOA MID modified the agency protection against retaliation and reporting to residents to become compliant with PREA. The PREA Coordinator was the designated staff responsible for monitoring for retaliation, developed the coordinated response checklist and ensuring that all notifications are completed per the standard. However, during this internal audit and assessment of our procedures, it was noted that this could possibly interfere and create a possible barrier with maintaining compliance. The PREA Coordinator whom also is the Senior Program Manager for the Women's program, was not only responsible for monitoring retaliation, but also responsible for monitoring the compliance of reporting incidents, scheduling the review of investigations, and collecting required data under the supervision and direction of the Director of Addiction Recovery Services. Modifications implemented to ensure that this area maintains compliance and efficiency was training a staff, outside of direct interaction with the Clients within Addiction Recovery Services, to become the Monitor for Retaliation.

In fiscal year 2019-2020, VOA MID had one (1) incident. The incident was reported and investigated per the policy and procedures without being substantiated. Even though the report was unsubstantiated, we decided it was in the best interest of the Client and our organization to offer the Client the process of monitoring for retaliation. Through our review team's assessment of how the investigation and follow up was handled, we determined some necessary modifications to our processes were needed to ensure we maintain a safe environment for all Clients and Staff. One of the changes implemented is mentioned above.

Assessment of Agency Progress in Addressing Sexual Abuse

We continue to see the benefit of VOA MID making the modifications needed in the previous audit in data collection, reporting, and monitoring. Last fiscal year, PREA monitoring was added to the agency wide quarterly monitoring practice managed by the Manager of Quality Assurance. This practice assisted us in maintaining accurate data for reporting on annual reports, for aggregation and corrective action planning. As noted in the chart below, data for fiscal year 2019-2020 was collected utilizing the above implemented practice and is the most accurate.

Community Confinement Facilities Total Allegations of Sexual Abuse	2016- 2017	2017- 2018	2018- 2019	2019- 2020
Substantiated	0	0	1	0
Unsubstantiated	0	1	2	0
Unfounded	0	0	0	0
TOTAL	0	1	3	0

Community Confinement Facilities Total Allegations of Sexual Harassment	2016- 2017	2017- 2018	2018- 2019	2019- 2020
Substantiated	0	0	0	0
Unsubstantiated	0	0	0	1
Unfounded	0	0	0	0
TOTAL	0	0	0	1

As VOA Mid- States continue to train staff and educate the Clients in regards to PREA, this allows for all to feel more comfortable and confident in reporting incidents. Having identified the PREA Coordinator as being the primary individual required to maintain the data accurately, allows for accountability.

In 2015, PREA Audits were conducted at one location for the one program at the time in which PREA standards were required. The facility was Shelby Men’s Halfway Back program. We were found to be 100% compliant with all standards. The women’s campuses and programs were not a part the audit until 2018. VOA MID-States will continue to make ongoing corrective action as needed to ensure compliance on all campuses of PREA Standards.

Approved by:



Jennifer Hancock, President and CEO